

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ANNMARIE MOTA,

Plaintiff,

Civil Action No. 3:17-cv-01862-N-BN

v.

BEACON BAY ASSET
MANAGEMENT, LLC,
JAMES VIRGIL WILLIS, AND
GLENN KLUPSAK

Defendants,

**DEFENDANTS BEACON BAY ASSET MANAGEMENT LLC'S and JAMES
VIRGIL WILLIS OBJECT TO PLAINTIFFS MOTION FOR A PRE-
TRIAL CONFERENCE ON SEPT 10TH, 2018.**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendants Beacon Bay Asset Management, LLC (“**Beacon Bay**”) and James Virgil Willis to object to Plaintiffs Motion for a pre-trial conference on September 10th, 2018.

OBJECTION

1. Defendants have already made travel and lodging arrangements to arrive on Sept 6th, 2017.
2. Defendant Beacon Bay and James Willis have requested the pre-trial conference to be held on September 7th, 2018. Defendants have voiced this request to the Courts Judicial Assistant, Donna Beyer.

3. Defendant Glenn Klupsak has indicated his request to hold the pre-trial conference on September 7th, 2018 and has voiced this request to Courts Judicial Assistant, Donna Beyer.
4. Defendants and Plaintiffs have known about this trial date for over 11 months.
5. Plaintiff is an airline employee and essentially has access to free travel.
6. Defendants are not Attorneys. Defendants are requesting a 2-day period-of-time between the pre-trial conference and the trial.
7. Defendants submit that Plaintiffs witnesses could testify via a video link that is available in the courtroom.
8. Defendants submit that per the SCHEDULING ORDER issued September 22, 2017 that ALL motions must have been filed as of June 15, 2108 and that the Plaintiff's motion should be denied.

Respectfully Submitted,

BEACON BAY ASSET MANAGEMENT LLC

JAMES VIRGIL WILLIS
Per Se representation

By: /s/ James Virgil Willis

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